

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTIRCT OF PENNSYLVANIA**

Melody Stoops, Plaintiff,  v.  Wells Fargo Bank, N.A., Defendant	Docket No. 3:15-cv-83-KRG  JUDGE KIM R. GIBSON
Melody Stoops, Plaintiff,  v.  Synchrony Bank, Defendant	Docket No. 3:15-cv-238-KRG  JUDGE KIM R. GIBSON
Melody Stoops, Plaintiff,  v.  Enhanced Recovery Company, LLC, Defendant	Docket No. 3:15-cv-262-KRG  JUDGE KIM R. GIBSON
Melody Stoops, Plaintiff,  v.  Credit Protection Association, L.P., Defendant	Docket No. 3:15-cv-218-KRG  JUDGE KIM R. GIBSON
Melody Stoops, Plaintiff,  v.  Comenity Bank, Defendant	Docket No. 3:15-cv-145-KRG  JUDGE KIM R. GIBSON
Melody Stoops, Plaintiff,  v.  Credit One Bank, Defendant	Docket No. 3:15-cv-00149-KRG  JUDGE KIM R. GIBSON

Melody Stoops, Plaintiff,  v.  Navient Corporation, Defendant	Docket No. 3:15-cv-00124-KRG  JUDGE KIM R. GIBSON
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**BRETT FREEMAN'S MOTION TO WITHDRAW**  
**AS COUNSEL FOR MELODY STOOPS AND REQUEST TO CONTINUE HEARINGS**  
**AND EXTEND DEADLINES**

1. The undersigned is counsel of record for Melody Stoops, the Plaintiff in the above-referenced matters.
2. Ms. Stoops has terminated the undersigned.
3. Ms. Stoops indicated that the firing would take effect once the undersigned had filed the instant motion, which also requests, at the request of Ms. Stoops, the continuance of certain hearings and an extension of time for certain events.
4. As of the filing of this motion, Ms. Stoops is in the process of locating new counsel.
5. Ms. Stoops is currently residing at 1007 Hammock Shade Dr., Lakeland, FL 33809. Ms. Stoops also has a mailing address of P.O. Box 42815, Clinton, PA 16640. Her phone number is (860) 729-4777.
6. Ms. Stoops is requesting that the Court continue the following hearings, to allow her time to obtain new counsel:
  - a. the December 15, 2015 status hearing, which involves all of the above-captioned matters; and
  - b. the December 9, 2015 case management conference in *Stoops v. Enhanced Recovery Company, LLC*, Docket No. 3:15-cv-262-KRG.

7. In addition, Ms. Stoops is presently reviewing her deposition transcripts in the following matters:

- a. *Stoops v. Wells Fargo Bank, N.A.*, Docket No. 3:15-cv-83-KRG; and
- b. *Stoops v. Navient Corporation*, Docket No. 3:15-cv-00124-KRG.

8. Currently, the deadlines for to review and change testimony under Rule 30(e)(1) are December 4, 2015 and December 16, 2015 respectively. Ms. Stoops hereby requests that her deadline under Rule 30(e)(1) to review and change the transcript be extended to January 18, 2016 in both of these cases, so she will have an opportunity to consult new counsel regarding these corrections.

WHEREFORE, the undersigned respectfully requests that the Court terminate his representation of Melody Stoops in each of the above-captioned matters, continue the hearings referenced in paragraph 6, and extend the deadlines referenced in paragraph 8.

s/ Brett Freeman

Brett Freeman; Bar Number PA308834  
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**CERTIFICATION OF EFFORTS TO COMPLY WITH L.R. 83.2(C)(4)**

The undersigned certifies that he has made repeated requests to Ms. Stoops to sign a copy of this motion, but she has not yet done so.

s/ Brett Freeman  
Brett Freeman

**CERTIFICATE OF SERVICE**

Service is being effectuated upon counsel for counsel of record via the CM/ECF system.

Ms. Stoops is being served by electronic mail to newbeginnings1952@gmail.com.

s/ Brett Freeman

Brett Freeman